

**MEMORANDUM
TO THE HONORABLE SANDRA L. TOWNS
U.S. DISTRICT JUDGE**

RE: YOUNG, BRIAN
AKA: Kelley, Brian
PACTS: 42241
DKT #: 05-CR-888, 05-CR-887, 06-CR-67
**Request for Order to Produce
Documents**

Reference is made the above named individual who is currently involved in violation proceedings before Your Honor. Our next court appearance is scheduled for October 22, 2007, at 10am. The undersigned officer has continued to investigate this matter and believes to have uncovered another undisclosed business operated by the offender. The purpose of this memorandum is to request an Order to Produce for business and incorporation records regarding Apollo Management Group, LLC.

By way of background, on August 8, 2007, the undersigned officer and our department's cyber crime specialist conducted a search of the offender's computer. Our inquiry revealed Apollo Business Consortium, a company owned and operated by the offender. Upon being questioned, the offender admitted to owning the company; however, it's business function is still in question. A recent internet search revealed a MySpace account for Apollo Business Consortium. The undersigned officer reviewed the companies' "friends" and discovered Apollo Management Group. A review of the pictures associated with the Apollo Management Group account revealed large homes, luxury boats, expensive cars, and a picture of the offender. Furthermore, Apollo Management Group is described as "The Ultimate Toy Factory", "a one-stop full service adult luxury toy store featuring the very best in exotic automobiles, exquisite homes all over the world, luxury yachts & mind-blowing motorcycles," which is consistent with some of the offender's prior business ventures.

A subsequent follow-up review of the documents obtained from the offender's computer revealed a letter addressed to Apollo Management Group LLC, 530 Sutter Avenue, Brooklyn, New York 11207. It is noted that this address was also associated with Apollo Business Consortium. A search of the New York State and Delaware, Department of State, Division of Corporations databases revealed an Apollo Management Gp, LLC, which was incorporated on January 29, 2007, in Delaware. Notably, Apollo Business Consortium was also incorporated in Delaware. Please find enclosed an Order to Produce for any and all documents related to Apollo Management Gp, LLC. Revealing another undisclosed company would further demonstrate the offender's deliberate unwillingness to contribute to his substantial restitution obligation.

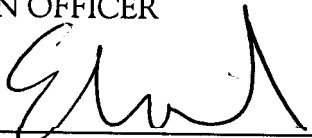
If agreeable to the Court, once we have received all relevant information pertaining to these matters, we will advise Your Honor of our findings with an appropriate recommendation. We

note that the offender's next court appearance will occur in the near future. Should the offender be sentenced prior to the conclusion of our investigation, we will forward all pertinent information to another federal investigative agency. We respectfully await Your Honor's decision.

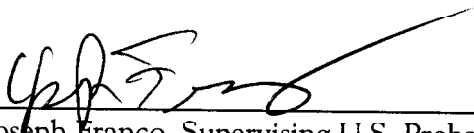
RESPECTFULLY SUBMITTED:

TONY GAROPPOLO
CHIEF U.S. PROBATION OFFICER

PREPARED BY:

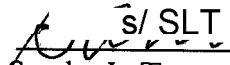

Erin Weinrauch, U.S. Probation Officer

APPROVED BY:


Joseph Franco, Supervising U.S. Probation Officer

The Court directs the following:

- ☒ Continue investigation, attached Orders have been signed.
- ☐ Other Directive

 s/ SLT
Sandra L. Towns, U.S. District Judge

10/12/07
Date

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

V.

Docket NO. 05-CR-888 & 05-CR-887 & 06-CR-68

Brian Young

ORDER TO PRODUCE DOCUMENTS

THIS CAUSE having come to be heard before me upon the motion of **Erin Weinrauch, United States Probation Officer, Eastern District of New York**, for an order directing **Corporation Service Company, 2711 Centerville Road, Suite 400, Wilmington, Delaware 19808**, to produce any and all documentation, including but not limited to banking records, article of incorporation, signatory information, and filing documents and fees regarding: **Apollo Management Group, Brian Kelly, and/or Brian Young**, from January 1, 2005, through the present, and after being fully advised in the premises, it is,

HEREBY ORDERED, pursuant to Title 28, United States Code, Section 1651, that **Corporation Service Company**, is to produce said recordings by the physical delivery of same to United States Probation Officer, Erin Weinrauch, at 75 Clinton St., Room 405, Brooklyn, NY 11201, **no later than October 20, 2007**. The existence of this order is not to be disclosed to the above parties.

DATE:

October 12, 2007

s/SLT

UNITED STATES DISTRICT JUDGE